

Exhibit 16

1 UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF NEW YORK

3 -----
4 **BLACK LOVE RESISTS IN THE RUST, et al.,**
5 **individually and on behalf of a class of**
6 **all others similarly situated,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., et al.,**

10 Defendants.
11 -----

12 **EXAMINATION BEFORE TRIAL OF MICHAEL J. HEALY**

13 **APPEARING REMOTELY FROM**

14 **ERIE COUNTY, NEW YORK**
15

16 July 28, 2023

17 10:00 a.m. - 12:05 p.m.

18 pursuant to notice
19

20
21 REPORTED BY:

22 Carrie A. Fisher, Notary Public

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

DEPAOLO CROSBY REPORTING SERVICES, INC.

135 Delaware Avenue, Suite 301, Buffalo, New York 14202
716-853-5544

~~MICHAEL J. HEALY~~

1 Q. How did you come to that understanding of that
2 term?

3 MR. SAHASRABUDHE: Objection to form.

4 A. Just from, you know, the way I interpret
5 things like that.

6 Q. Were you ever trained by the BPD on what
7 constitutes racially biased conduct?

8 MR. SAHASRABUDHE: Objection to form.

9 A. I don't believe so. I don't believe so.

10 Q. Did your supervisors ever discuss the issue of
11 racially biased conduct with you?

12 MR. SAHASRABUDHE: Objection to form.

13 A. I don't believe so, no.

14 Q. While at the BPD did you witness any racially
15 biased conduct by your peer officers?

16 A. No.

17 MR. SAHASRABUDHE: Objection to form.

18 A. Oh, I'm sorry. No, I did not.

19 Q. During your time in the BPD, were you ever
20 aware of any complaints of officers engaging
21 in racially biased conduct made by citizens?

22 A. No, I do not.

23 Q. During your time in the BPD were you aware of

~~DEPAOLO CROSBY REPORTING SERVICES, INC.~~

1 STATE OF NEW YORK)

2 COUNTY OF ERIE)

3
4 I, Carrie A. Fisher, Notary Public, in and
5 for the County of Erie, State of New York, do
6 hereby certify:

7 That the witness whose testimony appears
8 hereinbefore was, before the commencement of
9 their testimony, duly sworn to testify the
10 truth, the whole truth and nothing but the
11 truth; that said testimony was taken remotely
12 pursuant to notice at the time and place as
13 herein set forth; that said testimony was taken
14 down by me and thereafter transcribed into
15 typewriting, and I hereby certify the foregoing
16 testimony is a full, true and correct
17 transcription of my shorthand notes so taken.

18 I further certify that I am neither counsel
19 for nor related to any party to said action,
20 nor in anyway interested in the outcome
21 thereof.

22 IN WITNESS WHEREOF, I have hereunto
23 subscribed my name and affixed my seal this
15th day of August, 2023.



Carrie A. Fisher
Notary Public - State of New York
No. 01FI6240227
Qualified in Erie County
My commission expires 5/02/27

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